

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-223 (NEB/DTS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. AIMEE MARIE BOCK,
3. SALIM SAID,
4. ABDULKADIR NUR SALAH,
- and
6. ABDI NUR SALAH,

Defendants.

**GOVERNMENT'S MOTION IN LIMINE  
TO ALLOW WITNESSES TO BE  
RECALLED TO FACILITATE  
PRESENTATION OF EVIDENCE AT  
TRIAL**

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Matthew S. Ebert, and Daniel W. Bobier, Assistant United States Attorneys, respectfully submits the following motion in limine to allow witnesses to be recalled to facilitate the presentation of evidence at trial.

As explained below, the United States anticipates that it will need to recall a witness to allow for the orderly presentation of evidence. Accordingly, pursuant to Rule 611(a), the United States requests leave to recall witnesses to facilitate orderly presentation of evidence.

As explained in the trial brief and indictment, the defendants and conspirators opened an array of entities for use in carrying out the scheme. The defendants then enrolled these entities in the federal child nutrition program under the sponsorship of Feeding Our Future. The conspirators and their entities then submitted claims for

millions of dollars in federal child nutrition program funds for meals they didn't actually provide to children that didn't actually exist. For her part, Bock and her company sponsored dozens of companies' participation in the program and submitted their fraudulent claims to the Minnesota Department of Education.

The evidence in this case will involve testimony from various law enforcement agents introducing and summarizing the entities, fraudulent claims, fraudulent documentation, and flow of money for the defendants' sprawling fraud scheme. To avoid having law enforcement agents forced to be on the stand for days at a time introducing evidence related to various different entities and their fraudulent claims, the government seeks permission to recall certain witnesses to facilitate the presentation of the evidence and avoid jury confusion.

Rule 611(a) permits the Court to exercise control over the mode and order of witness presentation. Courts have expressed their approval of allowing witnesses to be recalled during trials to "make the interrogation and presentation effective for the ascertainment of truth." *United States v. Puckett*, 147 F.3d 765, 770 (8th Cir. 1998); *see also United States v. Butera*, 677 F.2d 1376, 1380–81 (11th Cir. 1982). In order to facilitate presentation at trial and allow for more ready comprehension by the jury,

the United States respectfully requests that it be allowed to recall case agents and forensic accountants.

Dated: January 10, 2025

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

BY: /s/ Joseph H. Thompson  
JOSEPH H. THOMPSON  
HARRY M. JACOBS  
MATTHEW S. EBERT  
DANIEL W. BOBIER  
Assistant United States Attorneys